

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,

Plaintiff,

v.

PLAZA HOTELS, LLC; STEVE
KETTER; MICHAEL WILEY; OKC
AIRPORT ES, LLC; ESH
STRATEGIES FRANCHISE, LLC;
KAJAL HOSPITALITY, LLC;
JALIYAN HOSPITALITY, INC.;
SUPER 8 WORLDWIDE, INC.; RAJ
KRUPA HOTEL, LLC; DAYS INNS
WORLDWIDE, INC.; CHAND &
SAAJ HOSPITALITY, INC.;
RAMADA WORLDWIDE, INC.;
YASH ENTERPRISES, INC.;
HOWARD JOHNSON
INTERNATIONAL, INC.; NOOR
HOTEL, LLC; AMBICA, LLC; OM,
LLC; INDRA, LLC; AND G6
HOSPITALITY FRANCHISING,
LLC,

Defendants.

No. 5:25-cv-00462-G

**DEFENDANT ESH STRATEGIES FRANCHISE, LLC’S
ANSWER AND AFFIRMATIVE DEFENSES
TO PLAINTIFF’S PETITION**

COMES NOW Defendant ESH Strategies Franchise, LLC (“ESH” or “Defendant”) and files its Answer and Affirmative Defenses to Plaintiff’s Petition, showing the Court as follows:

PARTIES

1. At this early stage in its investigation, this Defendant does not have sufficient evidence to either admit or deny any allegation contained in Paragraph 1.

2. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 2 of Plaintiff's Petition; therefore, said allegations are denied.

3. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 3 of Plaintiff's Petition; therefore, said allegations are denied.

4. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 4 of Plaintiff's Petition; therefore, said allegations are denied

5. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 5 of Plaintiff's Petition; therefore, said allegations are denied.

6. Defendant admits that it is a Delaware limited liability company who set and monitored the brand standards for the Extended Stay America Oklahoma City Airport located at 4820 W. Reno Avenue, Oklahoma City, OK 73127.

7. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 7 of Plaintiff's Petition; therefore, said allegations are denied.

8. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 8 of Plaintiff's Petition; therefore, said allegations are denied.

9. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 9 of Plaintiff's Petition; therefore, said allegations are denied.

10. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 10 of Plaintiff's Petition; therefore, said allegations are denied.

11. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 11 of Plaintiff's Petition; therefore, said allegations are denied.

12. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 12 of Plaintiff's Petition; therefore, said allegations are denied.

13. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 13 of Plaintiff's Petition; therefore, said allegations are denied.

14. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 14 of Plaintiff's Petition; therefore, said allegations are denied.

15. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 15 of Plaintiff's Petition; therefore, said allegations are denied.

16. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 16 of Plaintiff's Petition; therefore, said allegations are denied.

17. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 17 of Plaintiff's Petition; therefore, said allegations are denied.

18. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 18 of Plaintiff's Petition; therefore, said allegations are denied.

19. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 19 of Plaintiff's Petition; therefore, said allegations are denied.

INTRODUCTION

Pimpology

20. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

21. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

22. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

23. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

24. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

25. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

26. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

27. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

28. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

29. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

30. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

31. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

32. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

33. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

34. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

35. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

36. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

37. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

38. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

39. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

40. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

41. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

42. Defendant admits that the quoted material is a part of the cited statute. All other allegations in Paragraph 42 are denied.

43. Defendant admits that the quoted material is a portion of the cited statute. Any other allegations in paragraph 43 are denied.

44. Defendant admits that the quoted material is a portion of the cited statute. Any other allegations in paragraph 44 are denied.

45. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

46. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

47. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

48. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

49. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

50. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

51. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

52. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

53. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

54. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

55. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

56. This Paragraph, including all subparts, contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

57. Defendant denies the allegations in Paragraph 57 of Plaintiff's Petition.

58. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

59. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

60. Defendant admits that it requires Franchisees to have training on prevention of human trafficking. The remaining allegations in Paragraph 60 are denied.

61. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

62. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

63. Defendant denies the allegations in Paragraph 63 of Plaintiff's Petition.

64. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 64 of Plaintiff's Petition; therefore, said allegations are denied.

65. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

66. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

67. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

68. This Paragraph, including all subparts, contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

69. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

70. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

BACKGROUND

71. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 71 of Plaintiff's Petition; therefore, said allegations are denied.

72. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 72 of Plaintiff's Petition; therefore, said allegations are denied.

73. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 73 of Plaintiff's Petition; therefore, said allegations are denied.

74. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 74 of Plaintiff's Petition; therefore, said allegations are denied.

75. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 75 of Plaintiff's Petition; therefore, said allegations are denied.

76. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 76 of Plaintiff's Petition; therefore, said allegations are denied.

77. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 77 of Plaintiff's Petition; therefore, said allegations are denied.

78. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 78 of Plaintiff's Petition; therefore, said allegations are denied.

79. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 79 of Plaintiff's Petition; therefore, said allegations are denied.

80. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 80 of Plaintiff's Petition; therefore, said allegations are denied.

81. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 81 of Plaintiff's Petition; therefore, said allegations are denied.

82. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 82 of Plaintiff's Petition; therefore, said allegations are denied.

83. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 83 of Plaintiff's Petition; therefore, said allegations are denied.

84. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 84 of Plaintiff's Petition; therefore, said allegations are denied.

85. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 85 of Plaintiff's Petition; therefore, said allegations are denied.

86. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 86 of Plaintiff's Petition; therefore, said allegations are denied.

87. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 87 of Plaintiff's Petition; therefore, said allegations are denied.

88. Defendant denies the allegations in Paragraph 88 of Plaintiff's Petition.

89. This Paragraph, including its subparts, contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

90. Defendant denies the allegations in Paragraph 90 of Plaintiff's Petition.

91. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 91 and all its subparts of Plaintiff's Petition; therefore, said allegations are denied.

92. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 92 of Plaintiff's Petition; therefore, said allegations are denied.

93. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 93 of Plaintiff's Petition; therefore, said allegations are denied.

94. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 94 of Plaintiff's Petition; therefore, said allegations are denied.

95. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 95 of Plaintiff's Petition; therefore, said allegations are denied.

Plaza Inn Hotel

96. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

97. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

98. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

99. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

100. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

101. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

102. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

103. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

104. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

105. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

106. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Extended Stay America

107. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 107 of Plaintiff's Petition; therefore, said allegations are denied.

108. Defendant denies the allegations in Paragraph 108 of Plaintiff's Petition.

109. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 109 of Plaintiff's Petition; therefore, said allegations are denied.

110. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 110 of Plaintiff's Petition; therefore, said allegations are denied.

111. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 111 of Plaintiff's Petition; therefore, said allegations are denied.

112. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 112 of Plaintiff's Petition; therefore, said allegations are denied.

113. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 113 of Plaintiff's Petition; therefore, said allegations are denied.

114. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 114 of Plaintiff's Petition; therefore, said allegations are denied.

115. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 115 of Plaintiff's Petition; therefore, said allegations are denied.

116. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 116 of Plaintiff's Petition; therefore, said allegations are denied.

117. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 117 of Plaintiff's Petition; therefore, said allegations are denied.

118. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 118 of Plaintiff's Petition; therefore, said allegations are denied.

119. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 119 of Plaintiff's Petition; therefore, said allegations are denied.

120. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 120 of Plaintiff's Petition; therefore, said allegations are denied.

121. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 121 of Plaintiff's Petition; therefore, said allegations are denied.

122. Defendant denies the allegations in Paragraph 108 of Plaintiff's Petition.

123. Defendant denies the allegations in Paragraph 108 of Plaintiff's Petition.

124. Defendant denies the allegations in Paragraph 108 of Plaintiff's Petition.

Motel 6 Bricktown

125. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

126. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

127. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

128. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

129. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

130. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

131. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

132. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

133. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

134. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

135. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

136. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

137. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Super 8 OKC Airport

138. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

139. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

140. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

141. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

142. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

143. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

144. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

145. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

146. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

147. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Days Inns

148. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

149. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

150. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

151. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

152. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

153. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

154. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

155. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

156. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

157. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

158. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

159. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

160. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

161. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Ramada

162. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

163. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

164. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

165. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

166. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

167. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

168. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

169. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

170. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Howard Johnson

171. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

172. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

173. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

174. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

175. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

176. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

177. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

178. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

179. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

180. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

181. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Super 8 Prospect Avenue

182. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

183. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

184. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

185. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

186. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

187. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

188. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

Guest Reviews of the Defendant Hotels

189. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

190. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 190 and all its subparts of Plaintiff's Petition; therefore, said allegations are denied.

191. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 191 and all its subparts of Plaintiff's Petition; therefore, said allegations are denied.

192. This Paragraph, including all its subparts, contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

193. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

194. This Paragraph, including all its subparts, contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

195. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

196. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

197. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

198. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

199. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

200. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

201. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

202. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 202 of Plaintiff's Petition; therefore, said allegations are denied.

203. Defendant denies the allegations in Paragraph 203 of Plaintiff's Petition.

204. Defendant denies the allegations in Paragraph 204 of Plaintiff's Petition.

205. Defendant denies the allegations in Paragraph 205.

206. Defendant admits that ESH has authority to approve or disapprove either the Franchisee or a third-party management company as the "Manager" at the hotel as that term is defined in the Franchise Agreement, but the Franchisee or third-party management company makes all employment decisions regarding the hiring of the general manager and any subordinate managers. The remaining allegations

are not directed toward ESH, therefore no response is required and the allegations stand as denied.

207. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

208. Defendant admits that ESH required the Franchisee to use Franchisor technology systems. The remaining allegations in Paragraph 208 are not directed toward ESH, therefore no response is required and these allegations stand as denied.

209. Defendant denies that ESH has the access to Franchisee input alleged in Paragraph 209. The remaining allegations in Paragraph 209 are not directed toward ESH and therefore no response is required and these allegations stand as denied.

210. Defendant denies the allegations in Paragraph 210 of Plaintiff's Petition.

211. Defendant denies the allegations in Paragraph 211 of Plaintiff's Petition.

212. Defendant denies the allegations in Paragraph 212 of Plaintiff's Petition.

213. Defendant denies the allegations in Paragraph 213 of Plaintiff's Petition.

214. Defendant denies the allegations in Paragraph 214 of Plaintiff's Petition.

215. Defendant denies the allegations in Paragraph 215 of Plaintiff's Petition.

216. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

217. Defendant admits that Defendant ESH has the right to inspect for compliance with standards and that modifications can sometimes be made. However, Defendant denies any remaining allegations in Paragraph 217.

218. Defendant admits the allegations of Paragraph 218 as to ESH.

219. Defendant denies the allegations in Paragraph 219 of Plaintiff's Petition.

220. This Paragraph contains no allegations against Defendant and as such no response is required. To the extent there are any allegations against Defendant, such allegations are denied.

221. Defendant denies the allegations in Paragraph 221 of Plaintiff's Petition.

Count I: U.S.C. § 1595 (“TVPRA”)

222. Defendant incorporates by reference herein its responses and affirmative defenses to the foregoing and subsequent allegations contained in Paragraphs 1-221 of Plaintiff’s Petition as though fully set forth herein.

223. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 223 of Plaintiff’s Petition; therefore, said allegations are denied.

224. Denied as to Defendant ESH; Defendant is without knowledge or information sufficient to admit or deny the remaining allegations contained in Paragraph 224 of Plaintiff’s Petition, therefore, said allegations are denied by operation of law.

225. Denied as to Defendant ESH; Defendant is without knowledge or information sufficient to admit or deny the remaining allegations contained in Paragraph 225 of Plaintiff’s Petition, therefore, said allegations are denied by operation of law.

226. Denied as to Defendant ESH; Defendant is without knowledge or information sufficient to admit or deny the remaining allegations contained in Paragraph 226 of Plaintiff’s Petition, therefore, said allegations are denied by operation of law.

227. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 227 of Plaintiff's Petition; therefore, said allegations are denied.

Count II: 21 Okla. Stat. § 21-748.2(B) ("Oklahoma Sex Trafficking")

228. Defendant incorporates by reference herein its responses and affirmative defenses to the foregoing and subsequent allegations contained in Paragraphs 1-227 of Plaintiff's Petition as though fully set forth herein

229. Defendant is without knowledge or information sufficient to admit or deny the allegations contained in Paragraph 229 of Plaintiff's Petition; therefore, said allegations are denied

230. Defendant denies the allegations in Paragraph 230 of Plaintiff's Petition.

231. Defendant denies the allegations in Paragraph 231 of Plaintiff's Petition.

232. Defendant denies the allegations in Paragraph 232 of Plaintiff's Petition.

COUNT III: NEGLIGENCE OR PREMISES LIABILITY

233. Defendant incorporates by reference herein its affirmative defenses and responses to the foregoing and subsequent allegations contained in Paragraphs 1-232 of Plaintiff's Petition as though fully set forth herein.

234. Defendant denies the allegations in Paragraph 234 of Plaintiff's Petition.

235. Defendant denies the allegations in Paragraph 235 of Plaintiff's Petition.

236. Defendant denies the allegations in Paragraph 236 of Plaintiff's Petition.

Count IV: Intentional Infliction of Emotional Distress

237. Defendant incorporates by reference herein its responses and affirmative defenses to the foregoing and subsequent allegations contained in Paragraphs 1-236 of Plaintiff's Petition as though fully set forth herein.

238. Defendant denies the allegations in Paragraph 238 of Plaintiff's Petition.

239. Defendant denies the allegations in Paragraph 239 of Plaintiff's Petition.

Any other allegations in the Complaint including in the Prayer for Relief, not specifically addressed above are hereby denied.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

Plaintiff's Petition fails to allege facts sufficient to state a claim against Defendant upon which relief can be granted.

SECOND DEFENSE

Plaintiff's alleged damages were caused in whole or in part by the acts or omissions of persons other than Defendant, over whom Defendant had no control, or by the superseding intervention of causes outside Defendant's control.

THIRD DEFENSE

The intervening or superseding acts or omissions of person, firms, or corporations other than Defendant is the proximate cause or causes of Plaintiff's alleged injuries; thus, Plaintiff is not entitled to recover against Defendant in any sum or manner whatsoever.

FOURTH DEFENSE

Plaintiff's Petition is or may be barred entirely or in part by the applicable statute of limitations or repose.

FIFTH DEFENSE

Defendant denies that jurisdiction is proper.

SIXTH DEFENSE

Plaintiff's claims may be barred, in whole or in part, by the comparative/contributory negligence of Plaintiff.

SEVENTH DEFENSE

Defendants assert that whatever damages may have been sustained at the time and place alleged in the Petition were caused, in whole or in part, by the culpable

conduct of Plaintiff, without any negligence on the part of the Defendant. Consequently, Plaintiff's damages, if any, are to be diminished proportionally to reflect the culpable conduct and comparative/contributory fault of Plaintiff under the doctrine of comparative/contributory negligence. Defendant, therefore, is entitled to all reductions, set-offs and limitations of liability pursuant to the doctrine of comparative/contributory fault.

EIGHTH DEFENSE

Plaintiff's claims may be barred by the doctrines of assumption of the risk.

NINTH DEFENSE

If discovery reveals that, at the time and place of the alleged incident, Plaintiff was either a trespasser or an uninvited licensee, Defendant would not owe Plaintiff the duty or duties alleged in her Petition.

TENTH DEFENSE

To the extent Plaintiff alleges that she was assaulted or victimized by a third-party, the actions of the third-party were intentionally and specifically directed to Plaintiff. As such, no action by the Defendants could have precluded or prevented the actions of these third parties.

ELEVENTH DEFENSE

At the time and place set forth in the Petition, Plaintiff failed to use reasonable care and such failure was either the sole proximate cause of the event described in

the Petition, or in the alternative, contributed thereto to Plaintiff's alleged damages and, therefore, Plaintiff is either barred from recovery, or in the alternative, any damages awarded to Plaintiff against Defendant should be reduced pursuant to the rule of comparative negligence.

TWELFTH DEFENSE

If discovery reveals that at the time and place of the alleged incident, Plaintiff was attempting to commit a felony or was engaged in the commission of a felony on the property, Defendant would not owe Plaintiff the duty or duties alleged in the Petition, and further, Defendant would not be liable to Plaintiff for any damages.

THIRTEENTH DEFENSE

Defendant is entitled to a set-off for any settlement paid by any party or non-party, in satisfaction of the same damages for which the Plaintiff is suing.

FOURTEENTH DEFENSE

At all times material hereto, Defendant was not on notice or aware of any dangerous or unsafe condition or bad actor pertaining to the incident in question and that any alleged dangerous condition or bad actor was not discoverable through a reasonable inspection; accordingly, Defendant cannot be held liable, as a matter of law, for failing to take corrective action or warn of the bad actor or dangerous or unsafe condition alleged to have caused Plaintiff's damages.

FIFTEENTH DEFENSE

Defendant did not create any condition on the premises that was a danger to Plaintiff.

SIXTEENTH DEFENSE

Defendant did not exercise direct control over management of the hotel and the Franchisee is an independent contractor for whose actions Defendant is not responsible.

SEVENTEENTH DEFENSE

Plaintiff may have failed to join necessary or indispensable parties.

EIGHTEENTH DEFENSE

Plaintiff cannot recover for any of their claims under legal theories of joint or collective causation.

NINETEENTH DEFENSE

Oklahoma law does not recognize any Market Share Theory of liability or other theory that seeks to hold Defendant liable for claims without requiring proof that their acts or omissions were the proximate cause of a Plaintiff's alleged injuries.

TWENTIETH DEFENSE

Plaintiff has failed to articulate a causal relationship between their injuries and the conduct of Defendant.

TWENTY-FIRST DEFENSE

Defendant has not engaged in any unlawful conduct toward Plaintiff.

TWENTY-SECOND DEFENSE

Any alleged actions by Defendant did not cause Plaintiff's damages.

TWENTY-THIRD DEFENSE

Plaintiff's recovery of medical expenses, if any, are limited and/or governed by 12 O.S. § 3009.1.

TWENTY-FOURTH DEFENSE

Plaintiff failed to identify a duty breached by Defendant.

TWENTY-FIFTH DEFENSE

Plaintiff's alleged injuries were not reasonably foreseeable.

TWENTY-SIXTH DEFENSE

Joint liability is not cognizable in the State of Oklahoma.

TWENTY-SEVENTH DEFENSE

Defendant incorporates the defenses of the other Defendants as they may be applicable.

TWENTY-EIGHTH DEFENSE

1. Plaintiff's Petition, to the extent that it seeks punitive damages, violates Defendant's right to both procedural and substantive due process under the Fifth and Fourteenth Amendments to the United States Constitution and the Constitution of the State of Oklahoma in that:

A. The standards under which such claims are submitted are so vague as to be effectively meaningless and threaten the deprivation of property for the benefit of society without the protection of fundamentally fair procedures;

B. The highly penal nature of punitive damages threatens the possibility of excessive punishment and almost limitless liability without the benefit of fundamentally fair procedures and any statutory limitations;

C. The introduction of evidence of financial worth is so prejudicial as to impose liability and punishment in a manner bearing no relation to the extent of injury;

D. Oklahoma Law does not place a reasonable constraint on the jury's discretion when considering punitive damages;

E. Oklahoma Law does not provide sufficient post-trial procedures and standards, at the District Court level, for scrutinizing a punitive damage award;

F. Oklahoma law is not sufficiently established for adequate appellate review of punitive damage awards.

2. Plaintiff's Petition, to the extent it seeks punitive damages, violates Defendant's right to protection from "excessive fines" as provided in the Eighth Amendment of the United States Constitution and the Constitution of the State of Oklahoma.

3. Plaintiff's Petition, to the extent it seeks punitive damages, violates Defendant's right to equal protection under the law and is otherwise unconstitutional under the United States Constitution and the Constitution of the State of Oklahoma.

4. Plaintiff's claim for punitive damages is unconstitutional and in violation of the due process clauses contained in the Fifth and Fourteenth

Amendments to the United States Constitution and in Section 7, Article II of the Oklahoma Constitution in that, among other reasons, the standards for an award of punitive damages are unconstitutionally vague, and the issue is so prejudicial as to render an award the product of bias and passion in a way lacking the basic elements of fundamental fairness, in the absence of existing statutory limitations on a maximum possible award, and could unfairly result in an award bearing no relation to the nature and extent of Plaintiff's injuries.

5. Plaintiff's claim for punitive damages is unconstitutional under Article II, Section 9 of the Oklahoma Constitution in that, among other reasons, it constitutes an excessive fine designed to punish a wrongdoer for the benefit of society.

6. If Plaintiff sustained damages as alleged, which Defendant specifically denies, the assessment of exemplary or punitive damages violated Defendant's constitutional rights under the Fifth, Sixth, Eighth, and Fourteenth Amendment of the United States Constitution and any similar provision of the Oklahoma Constitution, including Article II §§ 2, 10, 15, 18, 19 and 21, in one or more of the following respects:

- a) The guidelines, standards, and/or instructions for assessing exemplary or punitive damages are vague, are indefinite, are uncertain, supply no notice to Bennett of the potential repercussions of its alleged conduct, set no limit on the damages that can be awarded, fail to require proof of every element beyond a reasonable doubt, are subject to the unbridled discretion of the jury, and do not allow adequate judicial review, thereby denying due process;

- b) The assessment of exemplary or punitive damages is criminal or penal in nature, and, therefore, the rights given Defendant in criminal proceedings are applicable;
- c) The assessment of exemplary or punitive damages amounts to the imposition of an excessive fine and/or cruel and unusual punishment;
- d) The assessment of exemplary or punitive damages exposes Defendant to multiple punishment and fines for the same act;
- e) The assessment of exemplary or punitive damages constitutes double jeopardy;
- f) The assessment of exemplary or punitive damages does not provide an adequate procedure for the determination of exemplary or punitive damages in violation of the equal protection and substantive and procedural due process requirement of the Oklahoma Constitution and the United States Constitution and in violation of the United States Supreme Court's decision in *Pacific Mutual Inc. co. v. Haslip*.

Defendant hereby gives notice that it intends to rely upon other affirmative defenses as they become available or apparent during the course of discovery and reserves the right to amend this Answer to assert any such defenses.

Prayer for Relief

WHEREFORE, having fully responded to Plaintiff's Petition, Defendant prays as follows:

- (a) That it may have a trial by a jury of six;
- (b) That it may have judgment entered in its favor;
- (c) That it is awarded costs cast against Plaintiff; and
- (d) That it should have any and all such further relief as this Court deems just and proper.

TRIAL BY JURY IS HEREBY DEMANDED.

Respectfully submitted and signed, under Fed. R. Civ. P. 11, on this 14th day
of May, 2025.

Respectfully submitted,

STEIDLEY & NEAL, P.L.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2025, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing.

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I hereby certify that on May 14, 2025 I filed the attached document with the Clerk of the Court and served the attached document by on the following, who are not registered participants of the ECF System:

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